

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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AUG 27 2004

In the Matter of  
  
Retention by Broadcasters of  
Program Recordings

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FEDERAL COMMUNICATIONS COMMISSION  
MB Docket No. 04-232 OFFICE OF THE SECRETARY

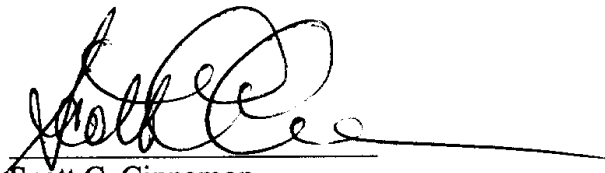
COMMENTS OF  
SUNBELT-SOUTH TELE-COMMUNICATIONS, LTD.

On behalf of Sunbelt-South Tele-Communications, Ltd., we are filing the original  
and four copies of its Comments in the above-captioned proceeding.

Respectfully submitted,

SUNBELT-SOUTH TELE-COMMUNICATIONS, LTD.

By:



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August 27, 2004

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## COMMENTS ON PROGRAM RETENTION MB DOCKET NO. 04-232

The Federal Communications Commission has invited comments on its Program Retention MB Docket No. 04-232 and we appreciate the opportunity to take part in this issue.

Sunbelt-South Tele-Communications, Ltd., is the licensee of WSST-TV and WSST-DT in Cordele, Georgia. Cordele is a very small community in South Georgia. However, the company feels very strongly that it provides far more than a small service to the entire area. The economic location makes it very difficult for the company to provide significant services without the addition of add-on burdens which are already adequately covered by existing FCC regulations and safeguards.

WSST-TV has no interest whatsoever in telecasting objectionable profanity or nudity and will never, ever violate the public trust by intentionally airing such material. To do so would not only violate the existing Commission Rules, but would also violate the faith which the public has in our station. We feel that the nation is dotted with other small broadcasters who feel the same way, but many of them may not avail themselves of this

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invitation to comment. We do not wish to wait until this matter has been concluded and then wish that we had taken part.

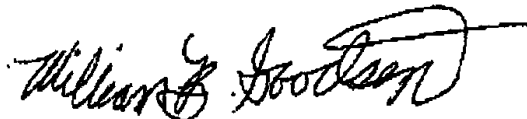
It may seem only a small task for metropolitan stations and groups to record and retain programming for a period of 60 or 90 days, but to us, the funds to purchase specialized recording equipment and hundreds of tapes is significant. Even more than that, however, is the cost of staff hours involved on a continuous basis for loading and changing tapes and especially in labeling and properly storing those tapes for easy access. This station has a full-time staff of 15 people including operators, production, sales, and management. An additional task and the supplies to perform that task would divert funds and time resources which are already stretched to the limit. These resources would have to be taken out of program expenses for such matters as coverage of local news, city commission meetings, county commission meetings, hospital and recreation board meetings and other programs that are offered by no one else in our area. There simply is no way to increase income in a slow economy in order for a very small market station to fund additional tasks. We do not have a hundred staff members standing around waiting for additional assignments. That would be wonderful if it were the case!

Our additional comment, (and we must admit that this is the most important) is that our station has never once had a complaint concerning nudity or profanity in local programming. This means no complaint to the FCC and no complaint to our station. We feel that the public spirit geared toward such a need was spurred entirely by the 2004 Super Bowl episode, which has absolutely nothing to do with our station. Further, the regulations already in place are a very strong deterrent toward our engaging in such programming. We

know that there are feelings both ways as to whether the Super Bowl episode could have been prevented by anyone other than the promoter, and we believe that even those stations involved with CBS were individually entirely innocent. No one can guarantee that a station will not be caught up in such an incident even if the FCC does finalize burdensome program retention rules. In small communities, however, our public simply will not tolerate any profanity or nudity of which we have control and neither will we. Telephone interviews are very, very rare and are delayed by recording except on occasions such as election returns. Studio and on-site interviews are almost always recorded and edited before airing. There are no telephone talk shows on our station at this time. So adding this requirement would add financial and time burden to a very small staff without making any significant contributions to the public interest. We believe that the FCC should develop a manner that would require program retention after there has been a complaint on a specific station, and then there would be a reason and a justification. It might be commented that such a policy would be similar to locking the barn door after the horse is stolen. Perhaps so. However, we think it makes a great deal more sense than locking the barn door when there was no horse inside in the first place. There is no horse inside at WSST and requiring us to purchase a door and lock it every day would be a needless burden taking funds and time from sources where it is greatly needed in serving the local public.

We earnestly petition the Commission not to place these program retention requirements on local broadcasters who have shown no intent and no background of violating the existing rules and regulations on these matters. We don't believe the rules need fixing, perhaps enforcing against those who have shown a bent toward nudity and

profanity. To add these requirements to each and every local broadcaster seems to us to be akin to punishing a driver who drives in such a manner as to give local officials no reason to suspect that he will ever violate the traffic laws. To ignore the existing rules and regulations would be completely alien to our background and the fine for such violation would put this station out of business and deny local television to our viewers. We don't believe that the rules need to be expanded to require 16 hours a day retention for 60 to 90 days in order to encourage us not to violate the Commission's and the public's sense of decency. Please do not place these burdens on local broadcasters or at least make some exemptions for small radio and television stations. It truly would be an unnecessary burden and remove our funds and efforts from other assignments that would better serve the public interest.



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William B. Goodson  
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Licensee of WSST-TV  
Cordele, Georgia